

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK


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| INTEGRATED MEDIA RESOURCES, LLC, | : | |
| Individually and Derivatively on Behalf of | : | |
| Nominal Defendant G2 FMV, LLC and also | : | |
| Double Derivatively on Behalf of Nominal | : | DECLARATION OF GEORGE |
| Defendant G2 INVESTMENT GROUP, LLC, | : | HONG LIU ROWE IN SUPPORT OF |
| | : | ORDER OF SUBSTITUTION OF |
| Plaintiffs, | : | COUNSEL |
| | : | |
| v. | : | Case No. 1:21-cv-04993-DLC |
| | : | |
| JONATHAN TODD MORLEY, DORI V. | : | |
| KARJIAN, DAVID SAMS, JONATHAN | : | |
| LERMAN, ANTONIO DE LA RUA, MARIA | : | |
| BOYAZNY, | : | |
| | : | |
| Defendants, | : | |
| | : | |
| and | : | |
| | : | |
| G2 FMV, LLC, and G2 INVESTMENT GROUP, | : | |
| LLC, | : | |
| | : | |
| Nominal Defendants. | : | |
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1. I am an attorney admitted to practice before the courts of the State of New York and the United States District Court for the Southern District of New York.
2. I respectfully submit this declaration pursuant to Local Rule 1.4 of the United States District Court for the Southern District of New York, in support of the attached proposed order substituting Eric A. Bensky for Howard Schiffman and George Hong Liu Rowe as counsel of record for Defendant David Sams.
3. Mr. Sams has requested that Eric A. Bensky and Murphy & McGonigle, P.C. represent him in this matter and has consented to the withdrawal of Mr. Schiffman and Mr. Rowe.
4. The Summons and Complaint in this case was served on Mr. Sams on June 17, 2021.
5. On July 12, 2021, the Court granted a letter motion for extension of time. Mr. Sams's time to answer or move is currently set for August 30, 2021.

6. The substitution of Mr. Bensky as counsel for Mr. Sams will not necessitate any changes to the current schedule.
7. Outgoing counsel is not asserting a retaining or charging lien.
8. Because Mr. Sams desires the assistance of new counsel and it is early in the litigation process, we submit that it is appropriate to allow new counsel to enter into the case at this time. This is Mr. Sams' first request to change counsel. Undersigned counsel hereby respectfully requests that the Court approve the proposed Order of Substitution of Counsel submitted in connection with this declaration.
9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 27, 2021

SCHULTE ROTH & ZABEL LLP

By: 
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Outgoing Attorneys for David Sams